UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF MASSACHUSETTS

SONYA LARSON

Plaintiff,

v.

DAWN DORLAND PERRY, et al.

Defendants.

Civil Action

No. 1:19-cv-10203-IT

MOTION TO IMPOUND CONFIDENTIAL AFFIDAVIT

Under the provision of Local Rule 7.2, I, Andrew D. Epstein, move this court to impound the Affidavit that I intend to file in Opposition to the Motion of Dawn Dorland Perry ("Dorland") to Strike Larson's Response to Dorland's Statement of Material Facts [Doc. No. 197].

The Affidavit in opposition to said Motion contains sensitive medical information about recent health concerns.

The impoundment order may be lifted after all court proceedings and appeals in this action have been finalized.

Respectfully submitted, On behalf of Plaintiff, Third-Party Defendant, Sonya Larson,

/s/ Andrew D. Epstein

Andrew D. Epstein, BBO No.155140

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Compliance with Local Rule 7.1

I certify that I notified Suzanne Elovecky of my intent to file a Motion to Impound my Affidavit on January 30, 2023, and Ms. Elovecky responded on the same day that she agrees with my motion to impound.

| | /s/ Andrew D. Epstein |
|-------------------|-----------------------|
| February 17, 2023 | Andrew D. Epstein |

Certificate of Service

I certify that the within Motion for Impoundment and Affidavit of Andrew D. Epstein were submitted to court and copies were sent by email to Atty. Suzanne Elovecky on February 17, 2023.

| | /s/ Andrew D. Epstein |
|-------------------|-----------------------|
| February 17, 2023 | Andrew D. Epstein |